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In re Application

Inventors:

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FEDERATED MANAGEMENT OF CONTENT

REPOSITORIES

PATENT APPLICATION

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Examiner:

P. Parthasarathy

Customer No. 23910

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Signature Date: July 15, 2005

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Mail Stop AF Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Dear Sir:

This Request is made in reply to the Advisory Action dated July 6, 2005 and is submitted concurrently with a Notice of Appeal.

I. ISSUE

The Examiner rejected claims 1-59 under 35 USC §102(e) as being anticipated by U.S. Publication No. 2004/0024812 ("Park"). To anticipate a claim, every element of the claim must be disclosed within a single reference. Applicants respectfully submit that Park fails in this regard.

I. SUMMARY OF THE INVENTION

Figure 1 of the present Application is an illustration of a virtual content management framework for integrating a plurality of content repositories into a single, virtual repository in an embodiment. A virtual or federated content repository (hereinafter referred to as "VCR") 100 is a logical representation of one or more individual content repositories 108 such that they appear and behave as a single content repository from an application program's 110 standpoint. In one embodiment, this is accomplished in part by use of an API (application program interface) 104 and an SPI (service provider interface) 102.

The API 104 presents a unified view of all repositories 108 to application programs 110 and enables them to navigate content, perform create, read, update, and delete operations, and search across multiple content repositories as though they were a single repository. Content repositories 108 that implement the SPI 102 can be integrated into the VCR 100. In one embodiment, the SPI 102 includes a set of interfaces and/or services that repositories 108 can implement and extend including but not limited to operations supported by the API 104.

In one embodiment, the API 104 and SPI 102 share a content model 106 that represents the combined content of all repositories 108 as a hierarchical namespace of nodes. At the top of the hierarchy is a federated root. Beneath the root are content repositories 108. Likewise, each content repository can have child nodes representing the content of that repository. Nodes can represent hierarchy information or content similar. This is analogous to directories and files in a file system. In this way, all of the content of all of the repositories 108 is integrated into a single hierarchical namespace.

II. OVERVIEW OF THE CITED ART

Park discloses a system for integrating and processing multimedia **content** – not **content repositories**. Park, ¶11. In contrast, embodiments of Applicants' invention integrate a plurality of content repositories such that they behave as a single, virtual content repository. Merely integrating **content** does not teach or suggest integrating **content repositories** into a virtual content repository.

This fundamental difference between <u>Park</u> and the present Application is further borne out with reference to Figure 1 in <u>Park</u>. Note that <u>Park</u> only discloses a <u>single repository</u> 8. According to <u>Park</u>, "the service operating function includes publishing content stored in the repository 8 in real time at a users [sic] request." <u>Park</u>, ¶31. In addition, "[t]he service publication server 4 can be provided with data from data sources such as a relational database system 15a, a file system 15b, a web site 15c on the Internet, an e-mail server 15d, and an application program 15e providing result data in XML." <u>Id</u>. Merely obtaining data from various sources does not teach or suggest integrating <u>content repositories</u> into a virtual content repository.

A closer examination of repository 8 and service publication server 4 in Figure 5 reveals a lack of any facility for integrating a plurality of content repositories. First, there is no apparent mechanism that would allow repositories to integrate themselves into a virtual content repository, such as a service provider interface (SPI). The repository management tool 7 is "for integrally managing **content** which will be used for publication" – it is not for managing **content repositories**. Park, ¶28 (emphasis added). Again, this underscores the fundamental difference between <u>Park</u> and the present Application.

Second, <u>Park</u> does not disclose a virtual content repository wherein a plurality of content repositories combine efforts to act as a single content repository. <u>Park</u> only discloses a single repository 8 that contains a single content repository 70 which in turn contains virtual web pages called "containers" 74. <u>Park</u>, ¶41. This is further evidenced by the fact that <u>Park</u> does not disclose a namespace that encompasses all of the information in a plurality of repositories. Instead, <u>Park</u> teaches that "containers 74 are stored in a directory 72 having a hierarchical structure, and the directory 72 may include one or more sub-directories." <u>Park</u>, ¶41. Merely storing virtual web pages in a hierarchical directory does not teach or suggest a namespace encompassing a plurality of content repositories.

Finally, <u>Park</u> does not disclose a content model that includes content from a plurality of repositories. A container in <u>Park</u> is converted into a container document object model (DOM) 55. <u>Park</u>, ¶59. However, merely converting a container into a DOM 55 does not teach or suggest a content model that includes content from each of a plurality of repositories. If anything, the DOM only includes content from a <u>single virtual web page</u> which is represented by the container.

III. ARGUMENT

B. Claims 1-10

Claim 1 recites in part, integrating into the VCR each one of said plurality of content repositories whose authorization information indicates successful authorization; wherein each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As discussed above in Section A, Park discloses integration of content – not repositories – in the form of virtual web pages. The relied upon portions of Park disclose a content request API 53 exposed by the service publication server 4 which accepts a request for a container 72 from a web server 62. Park, ¶58 and Figure 5. "Thereafter, the container transformation module 54 transforms the document in the XML format ... and transmits the transformed content (for example, HTML, HDML, or WML) to the web server 62 for the delivery to the device through the content request API 53." Park, ¶60. Assuming for argument's sake (but not conceding such) that the service publication server 4 is a content repository, the API 53 does not expose functionality for integrating the service publication server 4 into a virtual content repository.

For at least these reasons, claim 1 is not anticipated by \underline{Park} . Claims 2-10 depend from claim 1. It follows that the dependent claims are not anticipated by \underline{Park} for at least the same reasons.

C. Claims 11 – 20

Independent claim 11 recites in part, incorporating each one of said plurality of content repositories into a hierarchical namespace and wherein each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As argued above, <u>Park</u> does not disclose these features of Applicants' claim 11.

Claim 11 further recites in part, <u>extending a content model to include content from</u> each one of said plurality of content repositories.

Park discloses the repository content manager 61 loads a container in the memory of the service publication server 4 and converts the container into a container document object model (DOM) object 55. Park, ¶59. Thereafter, the content transformation module 54 is provided with a document in an XML format from the container DOM object 55. Id. Assuming for argument's sake (but not conceding such) that the DOM object is a content model, Park does not disclose extending it to include content from a plurality of content repositories – the DOM object represents a single container from a single repository.

Claim 11 further recites in part, incorporating each one of said plurality of content repositories into a hierarchical namespace.

As discussed above in Section A, containers can be "stored in a directory 72 having a hierarchical structure, and the directory 72 may include one or more sub-directories." Park, ¶41 and Figure 5. Assuming for argument's sake (but not conceding such) that a directory is a namespace, Park discloses that containers – not repositories – are stored in the directory 72.

For at least these reasons, claim 11 is not anticipated by \underline{Park} . Claims 12-20 depend from claim 11. It follows that the dependent claims are not anticipated by \underline{Park} for at least the same reasons.

D. Claims 21 – 29

Independent claim 21 recites in part, <u>a namespace is hierarchical and spans said</u> <u>plurality of content repositories</u>; and <u>wherein each one of said plurality of content repositories exposes a set of services to enable its integration into a virtual content repository (VCR).</u>

In contrast to Applicants' claim 21, <u>Park</u> discloses that a containers within a <u>single</u> repository 8 can be stored in a hierarchical directory structure. See <u>Section A</u> above. The directory structure in <u>Park</u> does not span a plurality of repositories.

Claim 21 also recites in part, wherein each one of said plurality of content repositories exposes a set of services to enable its integration into a virtual content repository (VCR). As argued above, Park does not disclose this feature.

For at least these reasons, claim 21 is not anticipated by \underline{Park} . Claims 21 - 29 depend from claim 21. It follows that the dependent claims are not anticipated by \underline{Park} for at least the same reasons.

E. Claims 30 - 39, 40-49 and 50-59

Independent claims 30, 40 and 50 recite in part, incorporating each one of said plurality of content repositories into a hierarchical namespace; extending a content model to include content from each one of said plurality of content repositories; and each one of said plurality of content repositories exposes a first set of services to enable its integration into the VCR.

As argued above, these features are not anticipated by \underline{Park} . For at least this reason, claims 30, 40 and 50 are not anticipated by \underline{Park} . Claims 31 – 39 depend from claim 30. Claims 41-49 depend from claim 40. Claims 51-59 depend from claim 50. It follows that the dependent claims are not anticipated by \underline{Park} for at least the same reason.

IV. CONCLUSION AND PRAYER FOR RELIEF

Accordingly, <u>Park</u> does not anticipate any of the claims. Applicants respectfully submit that all of the claims are in condition for allowance.

Respectfully submitted,

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